

REMARKS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 22-26, 28-40, and 42-44 are pending. Claim 40 is amended by the present amendment. The changes to Claim 40 are only for clarity. Thus, no new matter is added.

In the outstanding Office Action, Claims 22-26, 36-39, and 43 were rejected under 35 U.S.C. § 103(a) as unpatentable over Mauger, et al. (U.S. Patent No. 6,937,612 B1, herein “Mauger”) in view of Lunsford, et al. (U.S. Pub. No. 2002/0065041 A1, herein “Lunsford”), and Claims 28-35, 40, 42, and 44 were rejected under 35 U.S.C. § 103(a) as unpatentable over Mauger, Lunsford, and Fujioka (U.S. Patent No. 6,907,227).

At the outset, Applicant notes that the present invention is directed to point-to-point wireless communication between first and second multimedia devices operable according to different and/or incompatible first and second wireless standards. According to aspects of the invention, the first multimedia device receives application data from an application running thereon, as described at page 2, lines 25-35, of the Specification. According to additional aspects, the first multimedia device may obtain commands/parameters/data of the first wireless standard and perform processing including a conversion of the commands/parameters/data into processed commands/parameters/data, so that the first multimedia device may transmit the processed commands/parameters/data via a wireless connection according to the chosen wireless standard. Thus, the application requires no information of the communication standards, and an adaptation layer allows seamless switching from one wireless standard to another, as described at page 4, line 31, to page 5, line 32, of the Specification. The wireless standard can automatically be selected according to a battery condition of multimedia devices, as described at page 7, lines 14-16, for example,

or may be selected according to transmission properties of wireless connections, as described at page 8, for example.

Applicant respectfully traverses the rejection of the pending claims under 35 U.S.C. § 103(a).

Mauger describes a Multimedia Service Provider (MSP) (10) connected to multimedia terminals, where each multimedia terminal uses *one* communication protocol.¹ According to Mauger, the MSP (10) serves various terminals (i.e., H310, H320, H323, and H324 terminals) which make telephone calls to the MSP (10).² Mauger further describes that the MSP (10) provides services such that different terminals may interwork with each other and describes that a connection between two terminals *is relayed over* the MSP.³

In contrast, Claim 22 recites, *inter alia*, “a first multimedia device and a second multimedia device, which first multimedia device and second multimedia device are connected via *a point-to-point* wireless connection.” That is, Mauger does not describe any *point-to-point* communications between the terminals. Instead, Mauger describes *relaying* communications between the terminals via the MSP (10), without any *point-to-point* communications between the terminals.⁴

Mauger describes that the terminals are each assigned to *a single* protocol (i.e., H323 or H324 protocols) and does not describe that any of the terminals change protocols.⁵

In contrast, Claim 22 recites, *inter alia*, “which first multimedia device and second multimedia device are connected via a point-to-point wireless connection that is operable according to a first wireless standard *and* to a second wireless standard.” That is, Mauger does not describe that any of the terminals are operable according to first *and* second wireless

¹ Mauger at column 5, lines 41-43, and at Figure 1.

² Mauger at column 7, lines 18-23, and at Figure 1.

³ Mauger at column 5, lines 58-61.

⁴ Id.

⁵ Mauger at column 5, lines 45-50.

standards. Instead, Mauger merely describes that the terminals are each assigned *a single protocol*, without describing that the terminals are operable according to first *and* second wireless standards.⁶

Mauger describes that the MSP (10) determines and selects a transport type across the network and reassembles and reduces packet overheads if a conversion is needed.⁷ Mauger also describes that the MSP (10) selects adaptation layers which appear to be the most efficient and cause the least conversions for a call.⁸

In contrast, Claim 22 recites, *inter alia*, “a choosing in which at least one of the first wireless standard and the second wireless standard is chosen . . . by the first multimedia device.” That is, Mauger describes that *the MSP* (10) determines conversions and does not describe that *the terminals* choose conversions.

Finally, even if it is assumed that Mauger describes that the MSP (10) performs a standards conversion, Mauger merely describes that the MSP (10) performs *one* conversion.⁹

In contrast, Claim 22 requires, in the first multimedia device, a first command conversion from application commands, application parameters, and application data to respective connection commands, connection parameters, and connection data of the first wireless standard, and - if the wireless standard is changed - a second conversion to respective processed connection commands, processed connection parameters, and processed connection data of the chosen wireless standard. That is, Claim 22 specifies that *two* conversions may occur. In contrast, even if Mauger describes that the MSP (10) performs a standards conversion, Mauger merely describes that the MSP (10) performs *one* conversion.¹⁰

⁶ Id.

⁷ Mauger at column 7, lines 6-16.

⁸ Mauger at column 6, lines 33-38.

⁹ Id.

¹⁰ Id.

Accordingly, Mauger does not describe the above-discussed features of Claim 22, and Lunsford fails to cure these deficiencies.

Lunsford generally describes an automated telephone dialing system and is relied upon in the outstanding Office Action merely to teach wireless communication.¹¹ Applicant respectfully submits that Lunsford fails to cure the above-discussed deficiencies of Mauger.

Accordingly, Applicant respectfully requests that the rejection under 35 U.S.C. § 103(a) of Claim 22 and Claims 24-26 and 36-39, which depend therefrom, be withdrawn.

Claim 23, although differing in scope from Claim 22, patentably defines over Mauger and Lunsford for reasons similar to those described above with regard to Claim 22.

Accordingly, Applicant respectfully requests that the rejection under 35 U.S.C. § 103(a) of Claim 23 and Claim 43, which depends therefrom, be withdrawn.

Claim 40, although differing in scope and/or statutory class from Claim 22, patentably defines over Mauger and Lunsford for reasons similar to those described above with regard to Claim 22. Additionaly, Fujioka fails to cure the above-discussed deficiencies of Mauger and Lunsford.

Fujioka refers to slave terminals and a master terminal connected according to a Bluetooth protocol.¹² However, Fujioka does not refer to any details of a change from the Bluetooth standard to any other communication standard, and, therefore, cannot cure the above-discussed deficiencies of Mauger and Lunsford.

Accordingly, Applicant respectfully requests that the rejection under 35 U.S.C. § 103(a) of Claim 40 and Claims 42 and 44, which depend therefrom, be withdrawn.

¹¹ Lunsford at Abstract. Outstanding Office Action at page 6.

¹² Fujioka at Abstract.

As all other rejections of record rely upon at least Mauger and Lunsford, and Mauger and Lunsford do not describe, teach, or suggest the above-distinguished features, in combination, or in combination with any other art of record, it is respectfully submitted that a *prima facie* case of obviousness cannot be maintained. Thus, Applicant respectfully requests that the rejections of Claims 28-35, under 35 U.S.C. § 103(a), be withdrawn.

Accordingly, the outstanding rejections are traversed and the pending claims are believed to be in condition for formal allowance. An early and favorable action to that effect is, therefore, respectfully requested.

Respectfully submitted,

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